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April 26, 2024

Via CM/ECF

Hon. Magistrate Judge James R. Cho U.S. District Court, Eastern District of New York Courtroom: 11 D South 225 Cadman Plaza East Brooklyn, New York 11201

Re: Dajlani et al. v. Baby Generation, Inc.; Case No. 1:23-cv-03394-RER-JRC Request for Extension of Time to File Joint Status Report

Dear Magistrate Judge Cho:

When the Parties last appeared before the Court on April 1, 2024 for a conference concerning Defendant's motion to dismiss and certain discovery matters, Your Honor ordered, among other things, that the parties meet and confer concerning the discovery issues and file a Joint Status Report by May 1, 2024. (Minute Entry, April 1, 2024)

Given the observance of the Passover holiday by certain counsel (which concludes on April 30, 2024), as well as the Parties continued dialogue concerning the discovery matters at issue, I hereby respectfully request, with the consent and agreement of Defense Counsel, a one week extension of until and including May 8, 2024 for the Parties to file their Joint Status Report.

This is the first request for an extension of time to file the Joint Status Report. Moreover, the granting of this request shall not impact any other scheduled Court deadlines.

Respectfully submitted,

/s/ Joel B. Strauss
Joel B. Strauss
Counsel for Plaintiffs

cc: Defense Counsel (via CM/ECF)

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